

May 1, 2003

**RE: Covermaster, Inc. 039-17349-00137**

TO: Interested Parties / Applicant

FROM: Paul Dubenetzky  
Chief, Permits Branch  
Office of Air Quality

## Notice of Decision - Approval

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, ISTA Building, 150 W. Market Street, Suite 618, Indianapolis, IN 46204, **within eighteen (18) calendar days from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures

May 1, 2003

Mr. James Shafer  
Covermaster, Inc.  
57784 C. R. 3  
Elkhart, IN 46517

Re: 039-17349  
Third Administrative Amendment to  
Part 70 039-7354-00137

Dear Mr. Shafer:

Covermaster, Inc. was issued a Part 70 permit on April 18, 2001, for the operation of a stationary fiberglass truck cap and component manufacturing source. A letter requesting permit changes was received on March 10, 2003. The requested changes are related to the deletion of particulate control devices from the facility description of adhesive application areas ADH-01 and ADH-02. The total uncontrolled potential to emit of PM/PM-10 at these two areas is 1.19 tons per year or 0.27 pound per hour. According to 326 IAC 6-3-1(b)(14), manufacturing processes with potential emissions less than 0.551 pound per hour are exempt from the requirements of 326 IAC 6-3. According to 326 IAC 2-7-11(a)(7), an administrative amendment can be used for a change that "revises descriptive information where the revision will not trigger a new applicable requirement or violate a permit term". The requested changes meet this requirement, therefore, pursuant to the provisions of 2-7-11 the permit is hereby administratively amended as follows (~~strikeout~~ to show deletions and **bold** to show additions):

(1) Facility descriptions in Plant # 1 and Plant # 2 are amended as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]  
[326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices, which are separated listed under three (3) groups identified by the source as Plant #1 and Plant #2, corresponding to onsite production Buildings #1 and #2, which are both located at 57784 C.R. 3, and Plant #3, which is located in an adjacent building at 28706 Holiday Place Drive:

Plant #1 (57784 C. R. 3):

- (i) Adhesive application area identified as ADH-01, installed in April 2002, equipped with a high volume low pressure (HVLP) spray application system consisting of two (2) application guns for adhesive application ~~with dry filter for particulate overspray control, and exhausting at two (2) stacks identified as ADV-01 and ADV-02.~~

Plant #2 (57784 C. R. 3):

- (d) Adhesive application area identified as ADH-02, installed in April 2002, equipped with a high volume low pressure (HVLP) spray application system consisting of two (2) application guns for adhesive application ~~with dry filter for particulate overspray control, and exhausting at two (2) stacks identified as ADV-03 and ADV-04.~~

(2) Facility description in Section D.5 is amended as follows:

Facility Description [326 IAC 2-7-5(15)]:

Plant #1 (57784 C. R. 3):

- (i) Adhesive application area identified as ADH-01, installed in April 2002, equipped with a high volume low pressure (HVLP) spray application system consisting of two (2) application guns for adhesive application ~~with dry filter for particulate overspray control, and exhausting at two (2) stacks identified as ADV-01 and ADV-02.~~

Plant #2 (57784 C. R. 3):

- (d) Adhesive application area identified as ADH-02, installed in April 2002, equipped with a high volume low pressure (HVLP) spray application system consisting of two (2) application guns for adhesive application ~~with dry filter for particulate overspray control, and exhausting at two (2) stacks identified as ADV-03 and ADV-04.~~

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Madhurima Moulik, at (800) 451-6027, press 0 and ask for Madhurima Moulik or extension 3-0868, or dial (317)233-0868.

Sincerely,

Original Signed by Paul Dubenetzky  
Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

Attachments

mm

cc: File - Elkhart County  
U.S. EPA, Region V  
Elkhart County Health Department  
Northern Regional Office  
Air Compliance Section Inspector - Paul Karkiewicz  
Compliance Data Section - Karen Nowak  
Administrative and Development  
Technical Support and Modeling - Michele Boner

# **PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY**

**Covermaster, Inc.  
57784 C.R. 3  
Elkhart, Indiana 46517**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T039-7354-00137	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: April 18, 2001  Expiration Date: April 18, 2006

First Administrative Amendment No.: 039-15743  
Second Administrative Amendment No.: 039-16135  
First Minor Permit Modification No.: 039-16925

Issuance Date: April 11, 2002  
Issuance Date: July 3, 2002  
Issuance Date: April 1, 2003

Third Administrative Amendment No.: 039-17349	Pages Modified: 6, 47a
Issued by: Original Signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: May 1, 2003

- (e) One (1) spray paint booth identified as B-6, constructed October 20, 1995, coating a maximum of 8.125 fiberglass units per hour, equipped with a high volume low pressure (HVLP) spray application system consisting of two (2) spray guns and dry filter for particulate matter overspray control, and exhausting at four (4) stacks collectively identified as SV-6.
- (f) One (1) gel coat application booth identified as B-7, producing a maximum of 10 fiberglass truck caps and parts per hour, equipped with a high volume low pressure (HVLP) spray application system consisting of three (3) spray guns for color changes, using only one (1) gun at a time, and dry filter for particulate matter overspray control, and exhausting at one (1) stack identified as SV-7.
- (g) One (1) resin chop coat booth identified as B-8, producing a maximum of 10 fiberglass truck caps and parts per hour, equipped with one (1) flow coater chop gun and dry filter for particulate matter overspray control, and exhausting at one (1) stack identified as SV-8.
- (h) Two (2) product preparation booths, identified as Prep Booth B-1 and Prep Booth B-2, containing grinders, cutters and buffers and processing up to a total of 650 pounds of fiberglass product per hour, each equipped with a filter bank system for particulate matter control and exhausting inside the building.
- (i) Adhesive application area identified as ADH-01, installed in April 2002, equipped with a high volume low pressure (HVLP) spray application system consisting of two (2) application guns for adhesive application.

Plant #2 (57784 C. R. 3):

- (a) One (1) paint booth constructed July 16, 1998, coating a maximum of 195 fiberglass truck caps per day, equipped with a high volume low pressure (HVLP) spray application system consisting of one (1) basecoat gun and one (1) clear coat gun and dry filter for particulate matter overspray control, and exhausting at two (2) stacks identified as SV-14 and SV-15.
- (b) One (1) production area constructed July 16, 1998, producing a maximum of 195 fiberglass truck caps per day and consisting of:
  - (1) One (1) chop booth equipped with one (1) flow coater chop gun exhausting at two (2) stacks identified as SV-1 and SV-2, and
  - (2) One (1) gel coat application booth equipped with a high volume low pressure (HVLP) spray application system consisting of three (3) spray guns for color changes, using only one (1) gun at a time, with dry filter for particulate matter overspray control, and exhausting at one (1) stack identified as SV-3.
- (c) One Plant #2 Grind Booth for miscellaneous cutting and sanding operations for fiberglass and wood, constructed July 16, 1998, processing 730 pounds of product per hour, consisting of twelve (12) DA sanders, six (6) buffers, three (3) hand cutters, two (2) band saws, and two (2) table saws, exhausting at one (1) stack identified as SV-7.
- (d) Adhesive application area identified as ADH-02, installed in April 2002, equipped with a high volume low pressure (HVLP) spray application system consisting of two (2) application guns for adhesive application.

## SECTION D.5

## FACILITY OPERATION CONDITIONS

### **Facility Description [326 IAC 2-7-5(15)]:**

#### **Plant #1 (57784 C. R. 3):**

- (i) Adhesive application area identified as ADH-01, installed in April 2002, equipped with a high volume low pressure (HVLP) spray application system consisting of two (2) application guns for adhesive application.

#### **Plant #2 (57784 C. R. 3):**

- (d) Adhesive application area identified as ADH-02, installed in April 2002, equipped with a high volume low pressure (HVLP) spray application system consisting of two (2) application guns for adhesive application.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### **Emission Limitations and Standards [326 IAC 2-7-5(1)]**

#### **D.5.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]**

Any change or modification which may increase potential VOC usage to twenty-five (25) tons per year at the two (2) adhesive application areas combined, shall require prior approval from the Office of Air Quality (OAQ) before such change can occur.

### **Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

There are no compliance monitoring requirements specifically applicable to these facilities.

### **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

#### **D.5.2 Record Keeping Requirements**

- (a) To document compliance with Condition D.5.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits established in Condition D.5.1.
  - (1) The VOC content of each coating material and solvent used.
  - (2) The amount of coating material and solvent less water used on a monthly basis.
    - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
    - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
  - (3) The cleanup solvent usage for each month; and